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10 **UNITED STATES BANKRUPTCY COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA**

12 **LOS ANGELES DIVISION**

13 In re:

14 CRESTLLOYD, LLC,

15 Debtor and Debtor in Possession.

Case No.: 2:21-bk-18205-DS

Chapter 11 Case

16 **DEBTOR'S NOTICE OF MONTHLY FEE**
17 **STATEMENT OF SIERRACONSTELLATION**
18 **PARTNERS, LLC**

19 [October 1, 2024 through October 31, 2024]

20 [No Hearing Required, Unless Timely Opposition and
21 Request for a Hearing is Filed]

1 **PLEASE TAKE NOTICE** that, (A) on October 28, 2021, Crestlloyd, LLC, the Chapter
2 11 debtor and debtor in possession herein (the “Debtor”), filed a *Notice of Setting/Increasing Insider*
3 *Compensation* (the “Notice of Insider Compensation”) for SierraConstellation Partners LLC/Lawrence
4 R. Perkins (“SCP”) and served it on the UST and other parties, (B) on November 16, 2021, the United
5 States Trustee (the “UST”) filed its *Objection To Notice Of Insider Compensation* (the “Objection”)
6 [Dkt. 35] objecting to SCP’s Notice of Insider Compensation, (C) on December 13, 2021, the Debtor
7 filed its *Stipulation [With the UST] (1) Resolving UST Objection To Notice Of Insider Compensation*
8 *And (2) Vacating Hearing Thereon* (the “Insider Compensation Stipulation”) [Dkt. 72], (D) on
9 December 16, 2021, the Court entered its *Order Approving Stipulation [With the UST] (1) Resolving*
10 *UST Objection To Notice Of Insider Compensation And (2) Vacating Hearing Thereon* (the “Insider
11 Compensation Order”) [Dkt. 77].

12 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation
13 Stipulation and Insider Compensation Order, “SCP must file monthly fee statements [each a “Fee
14 Statement”] and serve the UST therewith, and, absent an objection by the UST or some other party in
15 interest within seven (7) days thereafter, the fees and costs may be paid in full. In the event of an
16 objection, the undisputed portion may be paid without prejudice to the balance subject to order of the
17 Court.”

18 **PLEASE FURTHER TAKE NOTICE THAT**, consistent with the foregoing procedure,
19 on December 12, 2021, the Court entered its *Interim Order* [the “DIP Order” [Dkr. 70]] *Granting*
20 *Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant*
21 *To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And*
22 *Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief* [the “DIP Motion”]
23 [Dkt. 66]], which, *inter alia*, granted the DIP Motion on an interim basis and approved the terms of the
24 DIP Loan Documents,¹ which provide, among other things, that:

25 Loan Proceeds shall be used solely in accordance with the Budget,
26 including for payment of the Facility Fee, Lender's reasonable
27 attorneys’ fees and costs incurred in making and documenting the
28 Loan, title insurance premiums, escrow fees, the Extension Fee,

¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the DIP Motion.

1 and the Carve Out and Borrower's working capital needs and to
2 administer the Chapter 11 Case, including insurance, repair,
3 maintenance and construction costs with respect to the Property.
4 With respect to the fees and costs of the Manager of the Debtor
5 [*i.e.*, SCP], Manager [*i.e.*, SCP] shall file monthly fee statements
6 and, absent an objection within seven (7) days thereafter, the fees
7 and costs may be paid in full. In the event of an objection, the
8 undisputed portion may be paid without prejudice to the balance
9 subject to order of the Court.

10 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation
11 Stipulation, Insider Compensation Order, DIP Motion, and DIP Order, SCP hereby files its Fee
12 Statement for the period from October 1, 2024 through October 31, 2024. SCP reserves its right to
13 supplement, amend, or modify the Fee Statement to include fees and/or expenses incurred during the
14 foregoing period not covered in the attached Fee Statement or incurred subsequent to October 31,
15 2024.

16 Annexed as **Exhibit "A"** hereto is the name of each professional who performed services
17 for the Debtor in connection with this chapter 11 case during the period covered by this Fee Statement
18 and the hourly rate and total fees for each professional during such period.

19 Annexed as **Exhibit "B"** hereto is the summary of hours in this Fee Statement broken up
20 by partner and task.

21 Annexed as **Exhibit "C"** hereto are the detailed time entries for the period covered by this
22 Fee Statement.

23 Annexed as **Exhibit "D"** hereto is the summary of expenses included in this Fee
24 Statement.

25 Annexed as **Exhibit "E"** hereto are the detailed entries for the expenses covered by this
26 Fee Statement.

27 **PLEASE TAKE FURTHER NOTICE** that objections, if any, to this Fee Statement
28 must be filed with the Court and served so as to be received by the undersigned counsel to the
Debtor no later than seven (7) days after the filing of this Fee Statement.

PLEASE TAKE FURTHER NOTICE that, (A) if no objection is properly and timely filed and served in accordance with the above procedures, the Debtor will pay SCP the fees and expense set forth in this Fee Statement (provided such payment is consistent with the Budget) and (B) if an objection is properly and timely filed and served in accordance with the above procedures, (1) the Debtor will pay SCP the undisputed portion of fees and expenses set forth in this Fee Statement (provided such payment is consistent with the Budget) and (2) any disputed portion of fees and expenses set forth in this Fee Statement shall be subject to review and further order by the Court.

Dated: November 23, 2024

CRESTLLOYD, LLC

/s/ Todd M. Arnold

DAVID B. GOLUBCHIK

TODD M. ARNOLD

LEVENE, NEALE, BENDER, YOO

& GOLUBCHIK L.L.P.

Attorneys for Debtor and Debtor in Possession

EXHIBIT A

Summary of SierraConstellation Partners Professional Fees by Consultant

For the Period October 1st through October 31st

<u>Consultant</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
Lawrence Perkins	CEO	\$1,100	0.00	\$0.00
Roger Gorog	Senior Director	\$615	2.60	\$1,599.00
Colin Moran	Senior Associate	\$370	4.00	\$1,480.00
			6.6	\$3,079.00

EXHIBIT B

Summary of SierraConstellation Partners Professional Fees by Activity

For the Period October 1st through October 31st

<u>Activity / Consultant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
<u>Business Operations, Cash Management & CRO Support</u>				
Lawrence Perkins	CEO	0.00	\$1,100	\$0.00
Roger Gorog	Senior Director	2.60	\$615	\$1,599.00
Colin Moran	Senior Associate	2.50	\$370	\$925.00
<i>Activity Total</i>		5.10		\$2,524.00
<u>Invoices, Fees and Retention Applications</u>				
Roger Gorog	Senior Director	0.00	\$615	\$0.00
Lawrence Perkins	CEO	0.00	\$1,100	\$0.00
Colin Moran	Senior Associate	1.50	\$370	\$555.00
<i>Activity Total</i>		1.50		\$555.00

EXHIBIT C

Summary of SierraConstellation Partners Professional Fees by Professional Service
For the Period October 1st through October 31st

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Business Operations, Cash Management & CRO Support				
<i>Colin Moran</i>				
10/21/2024	Compile September MOR	2.50	\$370.00	\$925.00
Colin Moran Total				\$925.00
<i>Roger Gorog</i>				
10/24/2024	Review MOR & MSR	1.50	\$615.00	\$922.50
10/25/2024	Communicate with counsel and bank regarding case status and timeline	1.10	\$615.00	\$676.50
Roger Gorog Total				\$1,599.00
Invoices, Fees and Retention Applications				
<i>Colin Moran</i>				
10/21/2024	Compile September MSR	1.50	\$370.00	\$555.00
Colin Moran Total				\$555.00

EXHIBIT D

Summary of SierraConstellation Partners Expenses by Category

For the Period October 1st through October 31st

Reimbursable Expenses

Amount

N/A

EXHIBIT E

Summary of SierraConstellation Partners Expenses by Detail

For the Period October 1st through October 31st

<u>Activity</u>	<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
N/A				

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled **Debtor's Notice Of Monthly Fee Statement Of SierraConstellation Partners, LLC [October 1, 2024 through October 31, 2024]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 25, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **November 25, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 25, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

November 25, 2024

Rebecka Merritt

/s/ Rebecka Merritt

Date

Type Name

Signature

NEF SERVICE LIST:

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Crestlloyd, LLC - US MAIL Service
UST Receiver RSN + Amended 20
Largest
File No.: 9562

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Branden Williams
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Beverly Hills, CA 90210

C.G.S. Custom Glass Specialists
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CAD Stone Works Inc.
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Sherman Oaks, CA 91403

Centurion Air, LLC
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West Valley Green Landscaping, Inc.
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